

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JAMES E. SHELTON, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

COMMITTEE FOR POLICE OFFICERS  
DEFENSE PAC

Defendant.

Case No. 24-4679

**JURY TRIAL DEMANDED**

**REQUEST FOR CLERK’S ENTRY OF DEFAULT AGAINST DEFENDANT  
COMMITTEE FOR POLICE OFFICERS DEFENSE PAC**

COMES NOW Plaintiff James E. Shelton, by and through the undersigned counsel, pursuant to FED. R. CIV. P. 55(a), and hereby files this Request for Clerk’s Entry of Default against Defendant Committee For Police Officers Defense PAC in the above-styled action. Plaintiff respectfully requests that the Clerk of Court enter default as the Defendants has failed to serve or file an answer to Plaintiff’s claims in this action within the time permitted by law or otherwise.

Federal Rule of Civil Procedure 12(a), entitled “Time to Serve a Responsive Pleading,” provides in pertinent part that “[a] defendant must serve an answer within 21 days after being served with the summons and complaint.” FED. R. CIV. P. 1(a)(1)(A)(i). Federal Rule of Civil Procedure 55(a), entitled “Entering a Default,” provides that “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk *must* enter the party’s default.” FED. R. CIV. P. 1(a)(1)(A)(i) (emphasis added).

Here, the Plaintiff filed his Complaint on September 5, 2024. (See ECF No. 1.) Defendant Committee For Police Officers Defense PAC was served with the Summons and Complaint on September 6, 2024. (See ECF No. 3.) Accordingly, Defendant's responsive pleading was due on September 27, 2024. Defendant did not file a response as of October 4, 2024. Although purported counsel for Defendant engaged with counsel for Plaintiff, no extension of time was granted. Accordingly, the Plaintiff requests that the Clerk enter the Defendant's default pursuant to FED. R. CIV. P. 55(a).

### **CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Clerk of Court enter default against the Defendant pursuant to FED. R. CIV. P. 55(a).

RESPECTFULLY SUBMITTED AND DATED this October 4, 2024.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
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Glenside, Pennsylvania 19038  
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**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date.

I further certify that I mailed a copy of the foregoing to:

Committee for Police Officers Defense PAC  
10521 Judicial Drive, Suite 200  
Fairfax, VA 22030

Dated: October 4, 2024

/s/ Andrew Roman Perrong  
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